

**UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON**

**UNITED STATES OF AMERICA**

**3:19-cr-00596-SI**

**v.**

**PROTECTIVE ORDER PERTAINING  
TO DISCOVERY**

**RICHARD STEVEN ALBERTS, II, and  
JOSEPH LUCIO JIMENEZ,**

**Defendants.**

Upon motion of the United States, this Court being advised as to the nature of this case, it is hereby:

ORDERED that pursuant to Rule 16(d)(1), Federal Rules of Criminal Procedure, counsel for defendants shall not provide defendants with copies of any discovery material produced by the government which contain:

- (a) sensitive information regarding sources of information or unindicted co-conspirators;
- (b) personal identifying information of any individual, including without limitation, any individual's date of birth, social security number, address, telephone number, email address, driver's license number, professional license number, or family members' names ("Personal Information"); or
- (c) financial information of any individual or business, including without limitation, bank

account numbers, credit or debit card numbers, account passwords, account names and contact

information, account history, account balances, account statements, or taxpayer identification numbers (“Financial Information”), unless counsel for defendants first redacts the above-described information from the discovery material.

IT IS FURTHER ORDERED that neither defense counsel nor defendants shall provide any discovery material produced by the government, whether or not the material is redacted, to any person not a party to this case without the government’s express written permission, except that defense counsel may provide discovery material to members of the defense team and to those persons who are necessary to assist counsel in preparation for trial or other proceedings.

IT IS FURTHER ORDERED that counsel for defendants shall not provide defendants with copies of discovery material produced by the government containing grand jury transcripts.

Dated: January 30, 2020

/s/ Michael H. Simon  
HONORABLE MICHAEL H. SIMON  
United States District Judge

Presented by:

BILLY J. WILLIAMS  
United States Attorney

*/s/ Scott E. Bradford*

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SCOTT E. BRADFORD, OSB #062824  
CRAIG J. GABRIEL, OSB #012571  
Assistant United States Attorneys